

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 00-6343-CR-ZLOCH

UNITED STATES OF AMERICA,

Plaintiff,

v.

LINDON JOHNSON,  
a/k/a "Pablo"  
a/k/a "Tommy"  
MOSI GRANT  
a/k/a "Pepe"  
a/k/a "Spanky"  
RICKY MOTEN  
VINCENT HAUGHTON,  
a/k/a "Junior," and  
TAMEKA JOHNSON

Defendants.

FILED  
MAR -8 10:33  
[Signature]

**GOVERNMENT'S NOTICE OF EXPERT TESTIMONY**

The United States of America, by and through the undersigned Assistant United States Attorney hereby provides notice pursuant to Fed. R. Crim. P. 16(a)(1)(E) of the Government's intent to use expert testimony in its case-in-chief at trial, and states as follows:

**Name of Witness:** Maria E. Hernandez

**Training/Qualifications:** See attached Summary of Training and Qualifications.

**Summary of Testimony/Opinion and basis:**

The government intends to call Maria E. Hernandez, a qualified forensic chemist who will give an expert opinion that the two packages seized from Cadia Gritton by DEA agents on January 16, 2000, and introduced into evidence by the government contain marijuana with net weights of 6.4 grams (package 1), and a net weight of 3216 grams (package 2). She will also

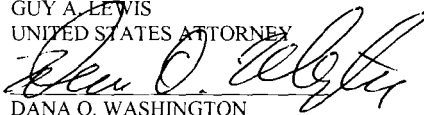
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testify that the three packages seized from Yvette Jenkins by law enforcement officers on March 2, 2000, and introduced into evidence by the government contain cocaine base ("crack cocaine") and phenacetin with net weights of 133.4 grams (package 1); cocaine hydrochloride and phenacetin with a net weight of 548.7 grams (package 2) and cocaine hydrochloride and phenacetin with a net weight of 4392 grams (package 3). The basis of the opinion is a gas chromatography/mass spectrometry and Fourier Transform Infrared Spectrophotometry test conducted by the witness, according to generally accepted practices and procedures. A copy of the lab reports was previously provided as part of the government's response to the standing discovery order.

The government also intends to call Special Agent Robert Shinn, DEA. He will testify that, based upon the his training and experience, the quantity of narcotics seized in this case is indicative of distribution quantities.

Having made this disclosure, the government hereby demands a written summary of expert testimony that the defense reasonably expects to offer at trial pursuant to Rules 702, 703 or 705 of the Federal Rules of Evidence, describing the witnesses' opinions, the bases and the reasons for those opinions, and the witnesses' qualifications.

Respectfully submitted,

GUY A. LEWIS  
UNITED STATES ATTORNEY  
BY:   
DANA O. WASHINGTON  
ASSISTANT UNITED STATES ATTORNEY  
Court No. A5500418  
500 E. Broward Blvd.  
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was sent via facsimile and

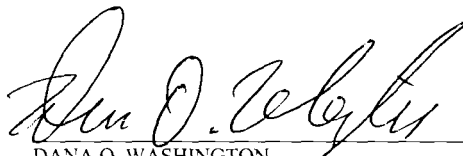
U.S. mail this day, March 8, 2001, to:

David Joffe, Esquire  
2900 Bridgeport Avenue  
Suite 401  
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Fax: (305) 446-5856  
*(Attorney for Lindon Johnson)*

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A handwritten signature in black ink, appearing to read 'Dana O. Washington', is written over a horizontal line.

DANA O. WASHINGTON  
ASSISTANT UNITED STATES ATTORNEY

**Maria E Hernandez*****Curriculum Vitae***5205 NW 84<sup>th</sup> Avenue

Miami, FL 33166

(305)590-4830

**Education**

Master of Science in Chemistry 1998  
Florida International University, Miami, FL

Bachelor of Science Degree  
Florida International University, Miami, FL 1995

Associate in Arts Degree  
Miami-Dade Community College, Miami, FL 1994

**Work Experience**

*Forensic Chemist*  
Drug Enforcement Administration 1999-present

*Chief Chemist*  
The Stephan Co. 1998-1999

*Analytical Chemist*  
Florida International University 1995-1998

*Teaching Assistant*  
Florida International University 1995-1998

*Research Assistant*  
Florida International University 1994-1995

**Training**

University of Oklahoma, Norman, OK

A training program under the supervision of Dr. R. Phillips involving  $^{13}\text{C}$  isotopic analysis and Pyrolysis GC

### Honors

- Dean's List at both Florida International University and Miami-Dade Community College
- Member of the Golden Key Honor Society
- Certificate of Outstanding Academic Achievement extended at Miami-Dade Community College
- Award of Merit presented by the Mayor of the city of Hialeah
- 2<sup>nd</sup> place in the National Spanish Examinations conducted by the American Association of Teachers of Spanish and Portuguese
- Member of the National Association of Female Executives

### Publications/Presentations

- M. Hernandez. "Molecular and Isotopic Characterization of Organic Matter from the Florida Everglades and the Florida Shelf: spatial and seasonal variability". Thesis
- M. Hernandez and R. Jaffe. "Molecular Characterization of Sedimentary Organic Matter from the Florida Everglades and the Florida shelf." Presented at the 18<sup>th</sup> International Meeting on Organic Geochemistry, Maastricht, The Netherlands, September 22-26, 1997
- M. Hernandez and R. Jaffe. "Molecular Composition of extractable lipids from the Florida Everglades: Assessment of organic matter sources." Presented at the First Annual Conference of the Walt Dineen Society, May 22-24, 1997
- M. Hernandez and R. Jaffe. "Molecular Characterization of Organic Matter from the Florida Everglades: Identification of Specific Biomarkers." Presented at the Florida ACS annual meeting, May 2-3, 1997
- M. Hernandez, Y. Deng, Gongora and Y. Zo. "Factors controlling the concentration of  $\text{H}_2\text{O}_2$  in the Southeastern U.S." Extended Abstract accepted by the European Geophysical society, XXI General Assembly, Hague, The Netherlands, May 6-10, 1996